

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION
BUREAU, et al.,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC
FINANCIAL SOLUTIONS, LLC), et al.

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.

DECLARATION OF
EMILY J. GAY, PARALEGAL

Case No. 24-CV-40-LJV

Emily J. Gay, declares under the penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a paralegal for attorney Terrence M. Connors, Esq., of Connors LLP.
2. I make this declaration in support of the defendants' Motion to Dissolve TRO.
3. I reviewed fifty (50) instances of Notary Face-to-Face Presentation Acknowledgements and calculated that the average time for the presentations is 44 minutes.
4. I attach five (5) instances of the Notary Face-to-Face Presentation Acknowledgements that are representative of the 50 that I reviewed hereto as *Exhibit A*.

5. I declare under the penalty of perjury that the foregoing is true and correct.

DATED: Buffalo, New York
January 16, 2024



Emily J. Gay, Paralegal

EXHIBIT A

FACE-TO-FACE PRESENTATION ACKNOWLEDGMENT

The undersigned representative of Burnette Legal Group, LLC d/b/a Monarch Group ("Monarch") hereby confirms as follows:

1. The representative has conducted a personal face-to-face presentation with the undersigned prospective client(s) on the date and at the time and location indicated below.
2. The face-to-face presentation consisted of reviewing the law firm's debt negotiation program and enrollment documents based upon the PowerPoint slides and script provided by the law firm, including, among other topics, informing the prospective client(s) that:
 - (a) the program will likely adversely affect your creditworthiness;
 - (b) the program may result in your being subject to collections;
 - (c) the program may result in your being sued by creditors or debt collectors;
 - (d) the program may increase the amount you owe due to the accrual of late fees and interest;
 - (e) you will own the funds held in your dedicated account; and
 - (f) you may withdraw from the program at any time without penalty, and you will receive all funds in the dedicated account, other than funds earned by the law firm in compliance with applicable law.
3. Following the presentation, the prospective client(s) initialed and executed the law firm's Client Retainer Agreement and associated enrollment documents in the presence of the representative, and was provided with copies of same.

Date: 1/24/2021

Start Time: 1:00 pm

End Time: 1:45 pm

Location: [REDACTED]

Affirmation by law firm representative:

I affirm the above statements are true and accurate:

Signature: [REDACTED]

Name: Daniel K. Walker

Acknowledged by prospective client(s):

Signature: [REDACTED]

Name: [REDACTED]

Signature: [REDACTED]

Name: [REDACTED]

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Date: 1-20-21

Start Time: 7:00 pm

End Time: 8:00 p.m.

Location: 


Affirmation by law firm representative:

I affirm the above statements are true and accurate:


Signature: Gary Samples

Name: Gary Samples

Acknowledged by prospective client(s):

Signature: 

Name: 

Signature: 

Name: 

FACE-TO-FACE PRESENTATION ACKNOWLEDGMENT

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3. Following the presentation, the prospective client(s) initialed and executed the law firm's Client Retainer Agreement and associated enrollment documents in the presence of the representative, and was provided with copies of same.

Date: 01-20-2021

Start Time: 2:00 pm

End Time: 2:45 pm

Location: [REDACTED]

Affirmation by law firm representative:

I affirm the above statements are true and accurate:

Signature: Charles B Robison

Name: Charles B Robison

Acknowledged by prospective client(s):

Signature: [REDACTED]

Name: [REDACTED]

Signature: [REDACTED]

Name: [REDACTED]

FACE-TO-FACE PRESENTATION ACKNOWLEDGMENT

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3. Following the presentation, the prospective client(s) initialed and executed the law firm's Client Retainer Agreement and associated enrollment documents in the presence of the representative, and was provided with copies of same.

Date: January 18th 2021

Start Time: 2:00 pm

End Time: 2:41 pm

Location: 

Affirmation by law firm representative:

I affirm the above statements are true and accurate:

Signature: 

Name: Olga Hernandez

Acknowledged by prospective client(s):

Signature: 

Name: 

Signature: _____

Name: _____

FACE-TO-FACE PRESENTATION ACKNOWLEDGMENT

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3. Following the presentation, the prospective client(s) initialed and executed the law firm's Client Retainer Agreement and associated enrollment documents in the presence of the representative, and was provided with copies of same.

Date: 15 January 2021

Start Time: 7:00pm End Time: 7:51pm

Location: 

Affirmation by law firm representative:

I affirm the above statements are true and accurate:

Signature: 

Name: Shonda L. Justice

Acknowledged by prospective client(s):

Signature: 

Name: 

Signature: _____

Name: _____